



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

April 24, 2024

VIA ECF

Hon. Analisa Torres
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *United States v. Miles Guo, et al.*, No. S3 23 Cr. 118 (AT)

Dear Judge Torres:

Earlier today, the Grand Jury returned a Superseding Indictment in this matter. The Superseding Indictment contained the following non-substantive changes, as compared to the previous charging document:

- “Ho Wan Kwok” is now primarily identified as “Miles Guo,” which is the name by which he is mostly commonly known;
- “Yanping Wang” is now primarily identified as “Yvette Wang,” which is the name by which she is mostly commonly known;
- The “Kwok Enterprise” is now identified as the “G Enterprise;”
- The reference to 1956(a)(1)(A)(i) formerly included in Count Three has been removed; and
- Count Four now charges only a conspiracy to commit securities fraud; the Superseding Indictment no longer includes the object, which was included in the prior charging instrument, of making false statements to financial institutions.

The Government will provide the Court by April 29, 2024 updated proposed requests to charge, verdict sheets, and voir dire to reflect these changes. To the extent contemplated by the Court, the Government has no objection to arraigning the defendants on the operative Superseding Indictment at the previously-scheduled May 14, 2024 final pretrial conference.

The Government is available to address any questions the Court may have.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: _____/s/

Micah F. Fergenson

Ryan B. Finkel

Justin Horton

Juliana N. Murray

Assistant United States Attorneys

212-637-2276/-2314/-6612/-2190